

**AFFIDAVIT OF JENS LUTZ**

North Carolina

County of Bladen

Jens Lutz, appearing before the undersigned notary and being duly sworn, says that:

I, Jens Lutz, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I am a former member of the Bladen County Board of Elections (the “Board”). I resigned from the Board on December 8, 2018.
4. Prior to resigning from the Board, I learned many facts that made me question the security and integrity of Bladen County elections.
5. At all times relevant herein, Leslie McCrae Dowless Jr., also known as McCrae Dowless, has had a close relationship with Cynthia Shaw, the Bladen County Board of Elections Director, and Gina Ward, the Bladen County Board of Elections Deputy Director.
6. It is my understanding that during prior election years, Board staff allowed Mr. Dowless to take and copy unredacted absentee ballot request forms, which include social security numbers, driver’s license numbers, state ID numbers, and signatures. Upon information and belief, this information gave Mr. Dowless the ability to request absentee ballots for anyone who has ever voted by absentee ballot by mail in the recent past.
7. In the course of our supervisory duties, we discovered that several forged absentee ballot request forms were submitted for the 2018 general election, including one request form on behalf of a deceased person, another submitted on behalf of a relative of fellow Board member Bobby Ludlum, and another submitted on behalf of a relative of Ms. Shaw. When I asked Ms. Shaw whether she had provided the State Board of Elections with the absentee ballot request form that had been submitted on behalf of the deceased individual, she informed me that she had not and that she had instead contacted Mr. Dowless and talked to him about it. I had previously provided a copy of the request form and a copy of the death certificate to the State Board of Elections.
8. It is my understanding that Open Records Laws allow citizens to receive information from County Boards of Election regarding when absentee ballots would be sent to specific voters. Mr. Dowless abused this provision in the law by regularly receiving such information (contained in a report titled “Absentee Ballot Voter Correspondence Report”) from Board staff, allowing Mr. Dowless to send his workers to those voters right after the ballots arrived. Because the race of the voter is included on this report, Mr. Dowless could have used it to target African American voters. On one occasion in the fall of 2018, I witnessed Mr. Dowless pressuring Board staff to provide this information to him. I confronted Mr. Dowless and told him that the Board office was closed. He responded

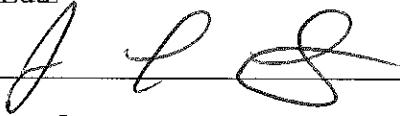
angrily, and my fellow Board of Elections member, Mr. Ludlum, went outside to explain the situation, after which he left the Board of Elections.

9. It is my understanding that Ms. Shaw had the ability to access the mail-in absentee ballot results prior to Election Day. She could do this by taking the thumb drive from the mail-in absentee ballot voting machine and inserting it into a computer that could read the results. She did not need to print a voting machine tape to get the results.
10. I know of one person who claims to have overheard Mr. Dowless bragging about pre-election candidate vote totals to multiple people after one-stop in-person, early voting ended, indicating that he was aware of the one-stop early voting totals, and that the candidate or candidates he supported were in the lead.
11. The Board office security is lax. A key to the absentee ballot room is kept on a wall in the Board office. Accordingly, anyone with access to the Board office can easily access the absentee ballot room. Absentee ballots were kept in zipped bags in the absentee ballot room.
12. The Board does not see the absentee ballots until the Board staff presents the ballots to the Board. When the Board staff receives absentee ballots, the Board staff codes the ballots (using the absentee ballot envelope bar code) into the system and creates an initial report. The absentee ballots are then presented to the Board. In multiple instances, there were discrepancies between the initial report and the actual the number of ballots presented to the Board.
13. I was informed that two voters, Emma Shipman and Datesha Montgomery, had been visited by a woman (later identified as Lisa Britt) who collected their absentee ballots. I checked Board records to confirm whether the absentee ballots had been returned to the Board; they had not been. I then met with Ms. Shipman and Ms. Montgomery, separately, and obtained statements regarding their experiences.
14. Several days after Ms. Shipman's statement had been received by Ms. Shaw, I was told by Ms. Shipman that the same woman who had initially collected her ballot had brought her ballot back to her, sealed in the ballot envelope and signed by two witnesses.

[Signature Page to Follow]

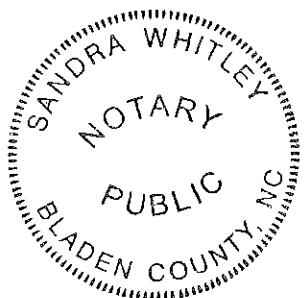
I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Jens Lutz

Signature: 

Date: 12/19/2018

Sworn to (or affirmed) and subscribed before me this 19<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires 3-12, 2023